

1 REMEDIAL BY HK CRAIG & ASSOCIATES, LLC

3 EASTERN DISTRICT COURT OF NEW YORK

FILED
IN CLERK'S OFFICE
US DISTRICT COURT E.D.N.Y.

★ JUL 31 2013 ★

BROOKLYN OFFICE

Case No.: 13cv311

4
5 PETER SCHUMAN, as individually on behalf of,
6 himself and all others similarly
7 situated,
8

Plaintiff,

9 vs.

10 HK CRAIG & ASSOCIATES, LLC and
11 JOHN AND JANE DOES NUMBERS 1
12 THROUGH 25, BEING FICTITIOUS NAME
13 OF UNIDENTIFIED PERSONS WHO
14 CONTROL THE POLICIES AND PRACTICES
15 INVOKED BY HK CRAIG & ASSOCIATES,
16 LLC,,
17

Defendant

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19 COMES NOW the Defendant HK CRAIG & ASSOCIATES, LLC, in answering the
20 allegations of the Complaint on file herein, affirms, denies and alleges as follows:

21 Answering the allegations of Paragraph 1-8 of the Complaint herein, Defendant
22 denies all facts.

23 Answering the allegations of Paragraph 9 of the Complaint herein, Defendant
24 affirms all facts.

25 Answering the allegations of Paragraph 10-13 of the Complaint herein, Defendant
26 denies all facts.

27 Answering paragraph 14 -Defendant denies all allegations.

28 Answering paragraph 15 -Defendant denies all allegations.

Answer - 1

1 Answering paragraph 14 -Defendant denies all allegations.
2 Answering paragraph 15 -Defendant denies all allegations.
3 Answering paragraph 16 -Defendant denies all allegations.
4 Answering paragraph 17 -Defendant denies all allegations.
5 Answering paragraph 18 -Defendant denies all allegations.
6 Answering paragraph 19 -Defendant denies all allegations.
7 Answering paragraph 20 -Defendant denies all allegations.
8 Answering paragraph 21 -Defendant denies all allegations.
9 Answering paragraph 22 -Defendant denies all allegations.
10 Answering paragraph 23 -Defendant denies all allegations.
11 Answering paragraph 24 -Defendant denies all allegations.
12 Answering paragraph 25 -Defendant denies all allegations.
13 Answering paragraph 26 -Defendant denies all allegations.
14 Answering paragraph 27 -Defendant denies all allegations.
15 Answering paragraph 28 -Defendant denies all allegations.
16 Answering paragraph 29 -Defendant denies all allegations.
17 Answering paragraph 30 -Defendant denies all allegations.
18 Answering paragraph 31 -Defendant denies all allegations.
19 Answering paragraph 32 -Defendant denies all allegations.
20 Answering paragraph 33 -Defendant denies all allegations.
21 Answering paragraph 34 -Defendant denies all allegations.
22 Answering paragraph 35 -Defendant denies all allegations.
23 Answering paragraph 36 -Defendant denies all allegations.
24 Answering paragraph 37 -Defendant denies all allegations.
25 Answering paragraph 38 -Defendant denies all allegations.
26 Answering paragraph 39 -Defendant denies all allegations.
27 Answering paragraph 40 -Defendant denies all allegations.
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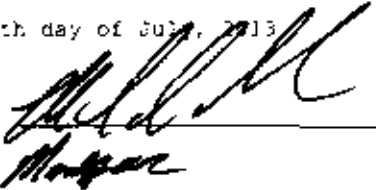
The Defendant now brings forth the following Affirmative Defenses:

DEFENSE 1 - Failure to State a Claim

1 Defendant answering the Complaint herein, alleges that all allegations and
2 counts in said forth therein fails to state a claim for which relief can be granted.

3
4 WHEREFORE, Defendant prays that the Plaintiff take nothing and the Defendant
5 have judgment against the Plaintiff and recover the costs of suit herein, and such
6 other relief the court may deem proper.

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8 Dated this 25th day of July, 2013.

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11 534 South Pineapple Avenue,
12 Suite 200
13 Sarasota, Florida 34236
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